



126742
Wallace Environmental Testing Laboratories, Inc

NHTSA-2000-7965-6

RECEIVED
01 MAY 10 PM 3:36

May 8, 2000

Petition for Import Eligibility Determination

Administrator
National Highway Traffic Safety Administration
Room 6115
400 7th Street SW.,
Washington, DC 20590

ATTN: NEF-32 Import Eligibility

Petitioner: Wallace Environmental Testing Laboratories, Inc.
2140 Wirtcrest
Houston, Texas 77055-1348
Registered Importer Number R-90-005

Wallace Environmental Testing Laboratories, Inc. (WETL) would like to submit this petition under the provisions set forth in 49 CFR Part 593.

The basis for this petition is a comparison to a substantially similar vehicle which was originally manufactured for importation into and sale in the United States and whose European counterpart can be readily modified to conform to all applicable Federal motor vehicle safety standards (FMVSS). Therefore, WETL submits this petition based on the guidelines set forth in 49 CFR 593.6(a).

The vehicle for which this determination is sought was originally manufactured by Porsche for the European and other foreign markets. The vehicle inspected was a 2000 model year with a vehicle identification number (VIN) of **WPOZZZ99ZYS**. The model is the Porsche GT3 manufactured for the 1999 and 2000 model year. Hereafter this vehicle will be referred to as the EUGT3.

A vehicle which is substantially similar was also manufactured by Porsche for the United States. The model designation for the US production vehicle is the Porsche 911 and was also imported for the 1999 and 2000 model year. Hereafter this vehicle will be referred to as the US911.

The US911 was certified by Porsche pursuant to 49 CFR 567. The



Wallace Environmental Testing Laboratories, Inc

vehicle was imported into the US by Porsche. Porsche sold this vehicle as a 2000 year model and affixed a label to it certifying that it complied with all applicable FMVSS.

It is common practice for vehicle manufacturers to produce substantially similar vehicles for different markets throughout the world. While the vehicles are essentially the same, the differences are related to the marketability and or legislation of the different countries. It is important to note that the EUGT3 complies with many FMVSS without any modification. WETL performed a careful evaluation of the EUGT3 and determined the vehicle to be substantially similar to the US911.

In accordance with the requirements of 49 CFR 593.6(a)(5), the remainder of this petition will give data, views, and arguments with respect to each FMVSS which applied to the US911 and demonstrate that the EUGT3 was either originally manufactured to conform to such standard, or is capable of being readily modified to conform to such standard. All statements that the EUGT3 complies with the requirements of the standard and is identical to the US911 with respect to the standard are based on information obtained during a detailed inspection of the EUGT3 for which this determination is sought. In addition, WETL reviewed all available parts, service, and sales literature in order to thoroughly compare the vehicles.

FMVSS 101

The EUGT3 complies with the requirements of this standard and is identical to the US911 with respect to this standard.

The digital speedometer is capable of indicating in miles or kilometers and is user selectable. The odometer is properly labeled in kilometers. While not identical to its US counterpart the unit meets the requirements.

The brake warning indicator must be added if necessary.

FMVSS 102

The EUGT3 complies with the requirements of this standard and is identical to the US911 with respect to this standard.

FMVSS 103

The EUGT3 complies with the requirements of this standard and is identical to the US911 with respect to this standard.

**Wallace Environmental Testing Laboratories, Inc****FMVSS 104**

The EUGT3 complies with the requirements of this standard and is identical to the US911 with respect to this standard.

FMVSS 105

The EUGT3 complies with the requirements of this standard and is identical to the US911 with respect to this standard.

<u>Part</u>	<u>Common Part Number</u>
Brake Master Cylinder	996-355-910-00

FMVSS 106

The EUGT3 complies with the requirements of this standard and is identical to the US911 with respect to this standard.

<u>Part</u>	<u>Common Part Number</u>
Brake Flex Lines	996-355-139-01

FMVSS 108

The EUGT3 complies with the requirements of this standard and is identical to the US911 with respect to this standard, except as noted below:

The EUGT3 is equipped with taillight lenses which do not conform to this standard. The taillight lenses must be replaced. The headlight assemblies while not identical to the US version are marked with the required DOT etching and conform with the requirement. In addition, this vehicle was equipped with no sidemarker lights. The left and right sidemarker lights must be installed for the EUGT3 to comply with this requirement. The EUGT3 is equipped with a High Mount Stop Light from the factory and conforms to this portion of the standard.

FMVSS 109

The EUGT3 complies with the requirements of this standard.

FMVSS 110

The EUGT3 requires the addition of a tire information placard to comply with the requirements of this standard.

**Wallace Environmental Testing Laboratories, Inc****FMVSS 111**

The EUGT3 complies with the requirements of this standard and is identical to the US911 with respect to this standard. The rearview mirrors are identical to the U.S. model and the passenger side rearview mirror has been inspected and replaced if necessary with the U.S. part number.

FMVSS 113

The EUGT3 complies with the requirements of this standard and is identical to the US911 with respect to this standard.

FMVSS 114

The EUGT3 complies with the requirements of this standard except as noted below.

The EUGT3 must be equipped with a microswitch in the ignition switch and the necessary warning buzzer. The necessary wiring and the buzzer module must be added to conform with this standard.

FMVSS 116

The EUGT3 complies with the requirements of this standard and is identical to the US911 with respect to this standard.

FMVSS 118

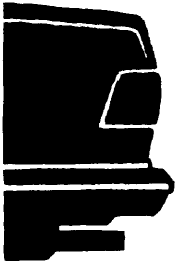
The EUGT3 complies with the requirements of this standard and is identical to the US911 with respect to this standard. The window transport mechanism is inoperative when the ignition switch is off.

FMVSS 124

The EUGT3 complies with the requirements of this standard and is identical to the US911 with respect to this standard.

FMVSS 201

The EUGT3 complies with the requirements of this standard and is identical to the US911 with respect to this standard. All parts which could effect conformance of this vehicle with the head impact

**Wallace Environmental Testing Laboratories, Inc**

requirements have been inspected and are identical to the US911. Including all upper interior padding.

<u>Part</u>	<u>Common Part Number</u>
Combined Instrument Assembly	996-641-104-03-70C

FMVSS 202

The EUGT3 complies with the requirements of this standard and is identical to the US911 with respect to this standard. The head restraints on this vehicle are integrated into the seat.

FMVSS 203

NOT APPLICABLE

FMVSS 204

The EUGT3 complies with the requirements of this standard and is identical to the US911 with respect to this standard.

FMVSS 205

The EUGT3 complies with the requirements of this standard and is identical to the US911 with respect to this standard.

FMVSS 206

The EUGT3 complies with the requirements of this standard and is identical to the US911 with respect to this standard.

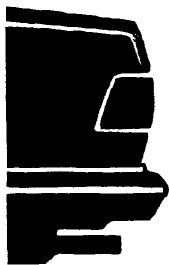
FMVSS 207

The EUGT3 complies with the requirements of this standard and is identical to the US911 with respect to this standard.

FMVSS 208

The EUGT3 complies with the requirements of this standard and is identical to the US911 with respect to this standard, except as noted below:

The EUGT3 is not equipped with a safety belt warning system for the driver. The seat belt latch must be replaced and a buzzer system conforming with this standard must be added.

**Wallace Environmental Testing Laboratories, Inc**

The front outboard designated seating positions are factory equipped with Type II seat belts. The drivers and passengers seating positions comply as equipped from the factory.

Both driver and passenger front outboard seating positions must be equipped or replaced with a U.S. version air bag system and knee bolsters if these are not installed.

<u>Part</u>	<u>Part number</u>
Air bag control unit	996-618-219-01
Driver Airbag	996-803-089-02
Passenger Airbag	996-803-071-06

FMVSS 209

The EUGT3 complies with the requirements of this standard and is identical to the US911 with respect to this standard.

FMVSS 210

The EUGT3 complies with the requirements of this standard and is identical to the US911 with respect to this standard.

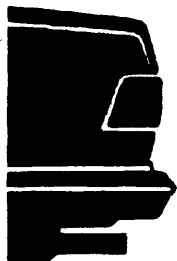
FMVSS 212

The EUGT3 complies with the requirements of this standard and is identical to the US911 with respect to this standard.

FMVSS 214

The EUGT3 complies with the requirements of this standard and is identical to the US911 with respect to this standard, except as noted below:

The EUGT3 ride height is lower than the US911. The EUGT3 suspension will be modified either with the replacement of the EUGT3 coil spring with the US911 coil spring, or with spring spacers added to the EUGT3 such that the ride height is identical to the US911. The current front bumper clearance height of the US911 is approximately 8" and the EUGT3 is approximately 4-9/16". The current rear bumper clearance height of the US911 is approximately 10" and the EUGT3 is approximately 9".



Wallace Environmental Testing Laboratories, Inc

FMVSS 216

The EUGT3 complies with the requirements of this standard and is identical to the US911 with respect to this standard.

FMVSS 219

The EUGT3 complies with the requirements of this standard and is identical to the US911 with respect to this standard.

FMVSS 301

The EUGT3 will be inspected and a roll over valve will be installed if necessary to meet the requirements of this standard.

FMVSS 302

The EUGT3 complies with the requirements of this standard and is identical to the US911 with respect to this standard.

49 CFR Part 541

This vehicle is equipped with the US model anti theft devices. This vehicle's anti theft devices will be inspected prior to importation and will be replaced as necessary.

49 CFR Part 565

The EUGT3 complies with the requirements of this standard and is identical to the US911 with respect to this standard.

49 CFR Part 581

The EUGT3 complies with the requirements of this standard and is identical to the US911 with respect to this standard, except as noted below:

The EUGT3 was not equipped with front and rear bumper shocks. The front and rear bumper shocks must be installed for the EUGT3 to comply with this standard. The EUGT3 is not equipped with rear bumper pads. Rear bumper pads must be installed for the EUGT3 to comply with this standard. Ride height issues will be resolved when modifications are made under FMVSS 214.



Wallace Environmental Testing Laboratories, Inc

I would like to thank you in advance for your consideration in this matter and invite you to contact myself or a member of my staff if you have any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Les Weaver', is written over a horizontal line.

Les Weaver
Vice President Operations
Wallace Environmental Testing Laboratories, Inc.